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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:18-cr-267-RFB-VCF

Plaintiff,

**Stipulation to Extend Deadline  
Regarding Production (First Request)  
[ECF 40]**

JAMES ROBERT KENNDY,

Defendant.

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United Attorney, through Jessica Oliva, Assistant United States Attorney, and Rene L. Ialess, Federal Public Defender, through Brian Pugh, Assistant Federal Public Defender, counsel for Defendant James Robert Kennedy, that the Government's deadline to file additional materials (ECF 40), currently set for November 19, 2019, be extended to November 26, 2019.

This stipulation is entered into for the following reasons:

1. On November 4, 2019, the Court ordered the Government to produce additional materials by November 19, 2019.

1           2. The Government has been working diligently but needs additional time to  
2 prepare these materials. The extension requested is not sought for purposes of delay, but to  
3 allow the Government sufficient time to prepare these materials.

4           3. This is the first request for an extension of time regarding the production  
5 deadline.

6           4. The parties agree to this extension.

7           5. Denial of this request for an extension could result in a miscarriage of justice.

8

9           DATED this 19th day of November, 2019.

10           Respectfully submitted,

11           RENE L. VALLADARES  
12           Federal Public Defender

13           /s/ Brian Pugh  
14           BRIAN PUGH  
15           Assistant Federal Public Defender  
16           Counsel for Defendant  
17           James Robert Kennedy

18           NICHOLAS A. TRUTANICH  
19           United States Attorney

20           /s/ Jessica Oliva  
21           JESSICA OLIVA  
22           Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:18-cr-267-RFB-VCF

Plaintiff,

V.

JAMES ROBERT KENNEDY,

Defendant.

## [Proposed] Order Granting Stipulation to Extend Deadline

## Regarding Production (First Request)

Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

IT IS HEREBY ORDERED that the deadline for the production of additional materials be extended to November 26, 2019.

DATED this 20th day of November, 2019.

HONORABLE RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

**Certificate of Service**

I hereby certify that on November 19, 2019, I electronically served on Counsel of Record the foregoing **Stipulation to Extend Deadline Regarding Production (First Request)** by filing it with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

s/ Jessica Oliva  
JESSICA OLIVA  
Assistant United States Attorney